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Attorneys for Defendant Marine Transport Lines, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN STEAMSHIP OWNERS	:	Civil Action No. 04-CV-4309 (LAK)
MUTUAL PROTECTION AND INDEMNITY	:	
ASSOCIATION, INC.,	:	(ECF CASE)
	:	
Plaintiff,	:	
v.	:	
	:	
ALCOA STEAMSHIP CO., INC., et al.,	:	
	:	<u>STATEMENT PURSUANT</u>
Defendants.	:	<u>TO RULE 7.1</u>
	:	

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrates of the Court to evaluate possible disqualification and recusal, the undersigned counsel of record for named Defendant Marine Transport Lines, Inc., erroneously named as Managers and Agents for several related entities on Ex. A to the Second Amended Complaint, dated July 8, 2004, certifies that:

- (1) named Defendant Marine Transport Lines, Inc. is wholly-owned by non-defendant Marine Transport Corporation, which is wholly-owned by non-defendant Crowley Maritime Corporation, a publicly held corporation;
- (2) no publicly-held corporation owns ten percent (10%) or more of the stock of named Defendant Marine Transport Lines, Inc. or its parents;
- (3) named Defendant Marine Transport Lines, Inc. is the parent company of non-defendant Marine Transport Management, Inc., which is the sole member of named Defendant Marine Chemical Navigation Corporation, which is now called Marine Chemical Navigation Corporation LLC;
- (4) named Defendant Marine Transport Lines, Inc. is the parent company of non-defendant Marine Transport Management, Inc., which is the sole member of named Defendant Marine Sulphur Shipping Corporation, which is now called Marine Sulphur Shipping Corporation LLC;

(5) named Defendants Marine Interests Corporation, Union Marine Transport Company, and Oswego Tanker Corporation have dissolved and no longer exist.

Dated: New York, New York
October 8, 2004

PROSKAUER ROSE LLP

By: /s/ Dale A. Schreiber
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